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David P. Cooke
Assistant General Counsel

October 8, 2001

Ms. Carlyn Winter Prisk (3HS11)
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Via UPS Delivery

Re: Lower Darby Creek Area Superfund Site

Dear Ms. Prisk:

On September 10, 2001, I sent to you the responses of Honeywell International Inc., as successor of Allied Chemical Inc., to EPA's §104(e) Request for Information regarding this site. Since then, we have found additional documents relevant to the Request for Information. These documents relate to disposal practices at Allied Chemical's Delaware Valley Works plant and are attached as Attachments 1 and 2 to this letter. The information reflected in these documents is provided in the following supplemental responses to Questions 7, 9 and 10 of the Request for Information (we have tried to avoid being repetitious in our responses even though there is some overlap among the various questions):

- 7) Delaware Valley Works: As noted in our initial response, the Delaware Valley Works was essentially divided into two locations: one in Claymont, Delaware, the other in Marcus Hook, PA. Before 1979 the Marcus Hook portion of the plant was called Baker and Adamson Works. Since our initial response we have found additional Eckhardt Reports compiled by Allied Chemical for the Baker and Adamson Works. We also found three other documents concerning waste disposal practices at the Baker and Adamson Works: two are waste surveys completed in 1969 and 1970 and one is a memo written in 1970. These documents are included in Attachment 1.

With respect to the Claymont, Delaware portion of the Delaware Valley Works plant, we have found transaction documents related to disposal by Wright Construction Company, in 1972, of 400 tons of phosphoric acid muds in a pit located on the Claymont facility's property. Other documents suggest that ABM Disposal Services returned three fluorine cylinders to Allied Chemical. (We have also located other

10-10-81
10-11

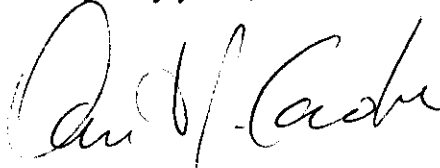
documents related to ABM Disposal Services which we did not have at the time of our initial response.) All of these documents are included in Attachment 2.

- 9) (a-c) Delaware Valley Works: In December 1969, the Baker and Adamson Works submitted a waste survey to Pennsylvania's Department of Health (included in Attachment 1) in which it indicated that "landfills in Folcroft" were among the places that a company called Gene Banta Sanitation Company transported its solid waste. Honeywell has no knowledge as to whether the survey's reference to "landfills in Folcroft" refers to the Site. It appears from the survey that Gene Banta selected the disposal sites. An Eckhardt Report (included in Attachment 1) indicates that Gene Banta had its business office in Chester, Pa. Honeywell has no information regarding the current status or existence of Gene Banta Sanitation Company.
- 10) (a-e) As mentioned in our supplemental response to Question 9, a 1969 waste survey indicates that Gene Banta Sanitation Company disposed of waste at "landfills in Folcroft". Honeywell has no knowledge as to whether this reference refers to the Site. Nonetheless, Honeywell offers the following response:

The waste survey gives no specific dates of disposal at Folcroft landfills. Nor does it indicate the length of time Gene Banta Sanitation Company may have disposed of waste at "Folcroft landfills," or the quantities that may have been disposed of at these landfills. It appears from the survey that burnable solid waste was incinerated and that non-burnable solid waste was landfilled. Glass, metal and chemicals were the types of solid waste disposed of in landfills. In March 1970, the Baker and Adamson Works submitted to The Travelers Research Corporation a waste survey (included in Attachment 1) in which it is stated that chemicals in trash included "floor sweepings and other such materials for which no practical method of recovery is available." It is further indicated that such chemicals were not hazardous.

If you have any questions about these responses, please call me.

Very truly yours,



ORIGINAL
(2nd)

ATTACHMENT 1

**DELAWARE VALLEY WORKS (BAKER & ADAMSON
WORKS)**

Marcus Hook, PA

B & A
Solid Waste

April 30, 1970

The Travelers Research Corporation
250 Constitution Plaza
Hartford, Connecticut 06103

Attention: Mr. Peter Kalika, Project Engineer

Gentlemen:

In response to your request of March 2, 1970, we are returning a completed copy of your questionnaire covering our solid waste disposal practices.

Very truly yours,

SPECIALTY CHEMICALS DIVISION
Baker & Adamson Works

ORIGINAL SIGNED
E. J. SHIELDS

E. J. Shields
Manager

EJE/eg

cc: B&A, Mr. J. Tcurish, Supt. Technical
B&A, Mr. N. Wallace, Supt. Maintenance
B&A, Mr. R. Hammenway, Supt. Production
MTO, Mr. J. A. Gouck, Specialist-Air & Water Control
MTO, Mr. J. L. Mason, Jr. Director of Production

The Travelers Research Corporation
250 Constitution Plaza
Hartford, Connecticut 06103
Contract No: CPE 69-5

Budget Bureau No. 85-S 88017
Approval expires August 31, 1970

"NATIONAL INDUSTRIAL SOLID WASTE MANAGEMENT STUDY OF THE INDUSTRIAL CHEMICAL INDUSTRY"

Industrial Survey Questionnaire

2378

Allied Chemical Corporation

Plant identification number

Company name

Baker & Adamson Works, Specialty Chemicals Division

Company division and plant name

Marcus Hook, Pennsylvania 19061

Plant address

T. Harris, Supvr. - Technical

Name and title of person completing questionnaire

1. Please provide the following general plant information

(a) Total plant employment

less than 100 ☐100 to 500 ☐500 to 1000 ☒greater than 1000 ☐(b) Size of plant location 50 acres, of which 40 are devoted to
production facilities.(c) Nature of area surrounding plant site: rural ☐ residential ☒ urban ☐

(d) Does plant use public solid waste disposal sites?

Yes ☐No ☒If yes, municipal ☐ county ☐ regional ☐ other ☐ (specify) _____(e) Are there local, regional, or state regulations in effect that govern your solid waste
activities?Yes ☒No ☐If yes, specify Pennsylvania Solid WasteManagement Act (Act 241)

2. Please complete the following regarding Non-Process solid waste activities:

| | Quantity (ton/yr)* | | Source Areas | | Storage (check) | | | | Storage period (days) | Ultimate disposal site & agency (on-site, off-site, captive, private, municipal) | |
|--|--------------------|-----------|--------------|------------------|-----------------|-------------|--------|-------|-----------------------|--|----------|
| | Measured | Estimated | % production | % Non-production | Containers | | Casual | Other | | Disposition | % |
| | | | | | Bulk | Com-paction | | | | | |
| Combustibles (paper, wood, bags, etc.) | | 1000 | 100 | | ✓ | ✓ | | | 1 | municipal incinerator | 100 |
| Non-combustibles (glass, drums, etc.)† | | 960 | 100 | | ✓ | | | | 1 | municipal landfill private dump | 50 50 |
| Salvageable metal | | 10 | 100 | | | | ✓ | | 30 | Sale | 100 |
| Total | | 1970 | | | | | | | | | |

* Estimate percentage of quantities resulting from manufacture of S.I.C. 281 chemicals:

Combustibles 100%, non-combustibles 100%, salvageable metals 100%.

The Travelers Research Corporation
 250 Constitution Plaza
 Hartford, Connecticut 06103
 Contract No. CPE 69-5

2 of 4

Industrial Survey Questionnaire
 Plant Identification Number 2378

2. (cont'd.)

| Classification | Ultimate Disposal Method | | | Cost of Disposal \$/Ton (including collection less applicable credit) | Remarks (e.g., additional detail on sources, composition, etc.) |
|----------------------|--------------------------|--------------|--------------------------------|---|--|
| | Land fill | Incineration | Other (burning, dump, etc.) | | |
| Combustibles | | ✓ | | \$20.00 | |
| Non-combustibles | ✓ | | Private Dump | \$20.00 | |
| Salvageable metal | | | Sale | Break Even | |

†Excluding salvageable metal.

3. Please identify the process solid wastes which are handled at your plant: (from the manufacture of S.I.C. 281 chemicals)

- | | |
|---|---|
| <input checked="" type="checkbox"/> Sludges | <input checked="" type="checkbox"/> Off quality product |
| <input checked="" type="checkbox"/> Filter residues | <input checked="" type="checkbox"/> Other <u>Spent Catalyst</u> |
| <input checked="" type="checkbox"/> Tars | <input type="checkbox"/> Other _____ |
| <input type="checkbox"/> Flyash | <input type="checkbox"/> Other _____ |

4. For each waste checked above, what are the sources (products or product groups) and quantities (tons per year)?

| Waste | Source | Quantities |
|-------------------|--------------------------------|------------|
| Catalyst | Industrial Inorganic Chemicals | 15 Tons |
| Filter Residues | Industrial Inorganic Chemicals | 104 Tons |
| Off quality Prod. | Industrial Inorganic Chemicals | 5 Tons |
| Sludge | Industrial Inorganic Chemicals | 15 Tons |
| Tars | Industrial Organic Chemicals | 1 Ton |
| | | |
| | | |
| | | |

Industrial Survey Questionnaire
Plant Identification Number 2378

5. For each process waste please complete the following tables:

A. Storage and Disposal

| Waste | Storage (containers, casual, etc.) | Storage period (days) | How transported to disposal area (truck, pipe line, captive, contract, municipal) | Disposal (on-site off-site) | Nature off-site disposal (private, municipal, regional) | Method of disposal (Landfill, incinerator, dump, casual) |
|---------------------|------------------------------------|-----------------------|---|-----------------------------|---|--|
| Catalyst | Cont. | 1 | Contract | Off | | |
| Filter Residues | Cont. | 1 | Contract | Off | Munic. & | Landfill |
| Off-quality product | Cont. | 1 | Contract | Off | Private | Dump |
| Sludge | Cont. | 1 | Contract | Off | | |
| Tars | Cont. | Varies | Contract | Off | Private | Dump |
| | | | | | | |
| | | | | | | |
| | | | | | | |

B. Cost of Disposal

| Waste | Cost of storage \$/ton | Cost of pre-treatment or special handling \$/ton | Cost of transporting \$/ton | Cost of disposal \$/ton | Total salvage cost, if any \$/ton | Credit |
|---------------------|------------------------|--|-----------------------------|-------------------------|-----------------------------------|--------|
| Catalyst | - | - | - | \$20 | None | None |
| Filter Residues | - | - | - | \$20 | None | None |
| Off-quality Product | - | - | - | \$20 | None | None |
| Sludge | - | - | - | \$20 | None | None |
| Tars | - | - | - | \$30 | None | None |
| | | | | | | |
| | | | | | | |
| | | | | | | |

6. For each waste, what are the physical and chemical characteristics pertinent to solid waste disposal activities (e.g., chemical identification, heating value, solubility, consistency, toxicity, density, etc.)?

| Waste | Characteristics |
|-------------------|---|
| Catalyst | Carbon Catalyst - Non-Combustible |
| Filter Residues | Insoluble Inorganic Residues - Non-Combustible |
| Off-quality prod. | Inorganic Chemicals - Non-Combustible |
| Sludge | Solid Organic Chemicals - Insoluble |
| Tars | Organic Still Bottoms - Fuming - Irritating - Insoluble |
| | |
| | Comment: While none of the process wastes in the above categories would constitute a high degree of toxicity by industry standards, each would contain some components that would be considered "toxic" in the public's concept of the term. |

Industrial Survey Questionnaire
Plant Identification Number 2378

7. For each process waste, please identify the plant operating parameter which most directly influences waste generation:

| Waste | Operating Parameter (Purity of raw material, degree of reaction, etc.) | Quantitative Relationship if known |
|---------------------|---|---------------------------------------|
| Catalyst | Raw Material Utilization | |
| Filter Residues | Raw Material Purity | |
| Off-Quality Product | Product Quality | |
| Sludge | Raw Material Purity | |
| Tars | Reaction By-Product | |
| | | |
| | | |
| | | |

8. For each waste, please provide an approximate five-year projection as to waste quantities, disposal practices, and costs:

Estimated For 1975

| Waste | Quantity Tons/Year | Disposal Practice | Estimated Cost \$/Ton |
|---------------------|-----------------------|----------------------|--------------------------|
| Catalyst | 18 | Private Contractor | \$32 |
| Filter Residues | 124 | " | \$32 |
| Off-Quality Product | 6 | " | \$32 |
| Sludge | 6 | " | \$32 |
| Tars | 1 | " | \$48 |
| | | | |
| | | | |

9. Remarks: Please provide any additional comments, which may be pertinent to the survey (e.g., any special problems encountered with particular wastes, nature of waste which prohibits certain disposal methods, etc.)

- 1) Plant uses all available methods for salvaging off-grade chemicals. Those appearing in trash consist of floor sweepings and other such materials for which no practical method of recovery is available. In any case, materials so disposed of are not hazardous.
- 2) Principal disposal problem is potentially hazardous chemicals that cannot be disposed of as ordinary non-burnable trash. These materials were once spread on the ground at a company-owned dump, but this practice has been discontinued and these materials are now being accumulated in drums and being held for disposal pending a reasonable solution.

13 & 14
Solid Waste

December 16, 1969

Commonwealth of Pennsylvania
Department of Health
P. O. Box 90
Harrisburg, Pa. 17120

Gentlemen:

Attached is the completed questionnaire as requested in your letter to our corporate headquarters on the subject, dated October 24, 1969.

Very truly yours,

SPECIALTY CHEMICALS DIVISION
Baker & Adamson Works

ORIGINAL SIGNED

J. TOURISH

J. Tourish
Supt. Technical

JT:mb

Attachment

cc: / B&A, Mr. E. Shields, Manager
/ MTO, Mr. J. A. Gouck, Specialist, Air & Water Control

Copy sent to
R. E. Gouck
G. Mason
1/6 22

The Pennsylvania Solid Waste Management Act (Act #241)
Industrial and Municipal Questionnaire
Solid Waste Processing and Disposal Site Permit Program

Name of firm or municipality: Allied Chemical Corp., Baker & Adamson Works

Address: Marcus Hook

County: Delaware

1. a) List types of waste which result from production or collection:
- 1) Burnable trash.
 - 2) Non-burnable (metal, glass, chemical).
- b) Of the above waste types, list those which are recycled or reused in the processing or manufacture of other products:

None

2. a) Does your municipality, company or firm dispose of solid wastes on-premise or otherwise operate a solid waste disposal site(s)?

Yes _____

No ✓

- b) If answer to number 2 a) is yes, list location of the solid waste disposal site(s):

3. a) Does your municipality, company or firm process solid wastes on-premise or otherwise operate a solid waste processing site(s)?

Yes _____

No ✓

- b) If answer to number 3 a) is yes, list location of the solid waste processing site(s):

4. If answer to numbers 2 and 3 is no, list name and location of site(s) where solid wastes are processed or disposed of:

All solid wastes removed under contract with Gene Banta Sanitation Company.

Disposal sites reported include Delaware County Municipal Incinerator, and landfills in Folcroft and Brookhaven (Delaware County).

J. Tourish
Signature of Official

12/15/69

Date

Return this completed questionnaire within thirty (30) days to:

Solid Waste Section
Division of Community Environmental Services
Pennsylvania Department of Health
P. O. Box 90
Harrisburg, Pennsylvania 17120

COMPANY CORRESPONDENCE

TO DIV: Specialty Chemicals
LOCATION: Morristown Office, Manufacturing
ATT'N OF: Mr. J. L. Mason, Dir. of Production
SUBJECT: SOLID WASTE INVENTORY
TRAVELERS RESEARCH CORPORATION

FROM DIV: Specialty Chemicals
LOCATION: Baker & Adamson Works

DATE: May 11, 1970

Handwritten:
Hester
B & A
Solid Waste
ORIGINAL
(9-11)
7/21 - Being dumped
on plant property.
J. Tammach is taking
check.

1. We refer to your teletype of 5/5/70 on the captioned subject.
2. The Works accumulates unsalvageable chemicals that, for one reason or another, represent too great a potential hazard to be put into the non-burnable trash category. Typical materials include:

- a) Sodium metal and peroxide.
- b) Phenol.
- c) Cyanides.
- d) Ammonium and sodium sulfides.
- e) Sulfan.
- f) Trichloroacetyl chloride still bottoms.
- g) Strong oxidizers.

Small quantities of some of these chemicals can be sewerred but this is not a large enough factor to be of significance. As a rough estimate, there is presently some 10,000 pounds of these chemicals in the plant in individual containers ranging from one pound bottles to 55 gallon drums. Most of it is obviously in drums, and Ammonium Sulfide comprises about half of the total weight.

3. A second category of potentially hazardous chemicals is represented by about 5,000 lbs of unidentified material in rusted drums from which all identifying marks have been obliterated. For the most part, the drums are in such poor condition that they couldn't be safely opened or, in some cases, moved.
4. A final category is water immiscible solvents for which no use can be found. Presently they are emptied on the ground and allowed to evaporate, but solid waste regulations and air pollution considerations will most probably necessitate our abandoning this practice shortly.
5. Regarding a solution to the problem; a combination of remedies will most likely be the final answer. Possible avenues include:
 - 1) Return to the vendor for disposal.

Continued.

Mr. J. L. Mason, Dir. of Production
Re: Solid Waste Inventory

May 11, 1970

ORIGINAL
(SND)

- 2) Scrap chemical dealers.
- 3) Contract process waste disposal (such as advertised by Rollins-Purle).
- 4) Controlled burning of solvents (where only CO₂ and H₂O are produced).

The Works is presently considering the whole matter of off-grade unusable chemicals from the standpoint of handling, and departmental responsibility as well as ultimate disposition, and intends to develop formal guidelines in the near future.

ORIGINAL SIGNED

J. TOURISH
J. Tourish
Supt. Technical

JT:mb

cc: / B&A, Mr. E. J. Shields, Manager
✓ MTO, Mr. J. A. Gouck, Specialist-Air & Water Control
B&A, Mr. N. Kuller, Supt. Production
B&A, Mr. R. Hemmenway, Supt. Production

Company Name: Allied Chemical Corporation RECEIVED JUN 18 1979
Facility Name: Baker & Adamson Works
Address: Wilmington Turnpike
No. Street
Marcus Hook, Pennsylvania 19061
City State Zip Code
Name of Person Completing Form: Alfred G. Bisignani
Position: Supervisor, Environmental
Phone Number: (201) 455-4294

File
B & A
Solid
Waste

1. Year Facility Opened 19 44 (10-11)
2. Primary SIC Code : 2819 (12-15)
2 8 6 9
3. Estimate the total amounts of process wastes (excluding wastes sold for use) generated by this facility during 1978:
thousand gallons (16-24)
hundred tons 24 (25-32)
thousand cubic yards (33-41)
4. Estimate (in whole percents) how these process wastes generated in 1978 were disposed of:
in landfill 90 (42-44)
in pit/pond/lagoon - (45-47)
in deep well - (48-50)
incinerated 1 (51-53)
reprocessed/recycled - (54-56)
evaporated - (57-59)
unknown - (60-62)
other (Specify Awaiting Disposal) 9 (63-65)
5. What is the total number of known sites (including disposal on the property where this facility is located as one site) that have been used for the disposal of process wastes from this facility since 1950? 12 (66-68)

COMPLETE ONE FORM "B" FOR EACH OF THE SITES

6. Have any of the process wastes generated at this facility been hauled (removed) from this facility for disposal? (Yes=1; no=2) 1 (69)

IF YES, COMPLETE FORM "C"

7. Do you know the disposal site locations of all of the process waste hauled from your facility since 1950? (Yes=1; no=2) 2 (70)

IF NO, COMPLETE ONE FORM "D" FOR EACH FIRM OR CONTRACTOR WHO TOOK WASTE TO AN UNKNOWN LOCATION

8. Specify the earliest year represented by information from company or facility records supplied on this and other forms 19 58 (71-72)
9. Specify the earliest year represented by information from employee knowledge supplied on this and other forms 19 46 (73-74)

19-97

| <u>Material</u> | <u>Tons</u> |
|---|-------------|
| BNSA Muds (in drums) | 8 |
| Solvents (in drums) | 15 |
| Misc. Chemicals (in drums) | 24 |
| EPS Basin Sludge (basins are rubber lined) | 112 |
| Calcium Acetate Muds (in drums) | 4 |
| Phenol Strippers (in drums) | 25 |
| BF ₃ Etherate (in drums) | 14 |
| BF ₃ Phenalate | |
| Perclene Still Bottoms (in drums) | <u>7</u> |
| Total | 209 |

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: Allied Chemical Corporation
Facility Name: Baker and Adamson Works
Name of Site: Kin Buc Landfill
Address of Site: Meadow Road
no. street

Edison NJ
city state zip code

Name of Owner (while used by facility): Scientific Chemical Treatment
Address: Scotch Plains, NJ
no. street

city state zip code

Current Owner (if different from above): don't know
Address: no. street

city state zip code

1. Location (1= the property on which facility is located; 2= off-site)..... 2 (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership) 2 (11)
3. Current status (1= closed; 2= still in use; 9=don't know) 1 (12)
IF CLOSED, specify year closed 19 76 (13-14)
4. Year first used for process waste from this facility 19 74 (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) 19 76 (17-18)
6. Total amount of process waste from this facility disposed at site:
thousand gallons 1 1 1 1 1 1 (19-26)
hundred tons 1 1 1 1 1 1 4 (27-33)
thousand cubic yards 1 1 1 1 1 1 1 (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)
landfill, mono industrial waste 1 (42)
landfill, mixed industrial waste 1 (43)
landfill, drummed waste 9 (44)
landfill, municipal refuse co-disposed ... 9 (45)
pits/ponds/lagoons 9 (46)
deep well injection 9 (47)
land farming 9 (48)
incineration 9 (49)
treatment (eg. neutralizing)..... 9 (50)
reprocessing/recycling 9 (51)
other (specify) 9 (52)
8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) 9 (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

The process wastes sent to the landfill averages approximately 75% water and 25% solids. The heavy metals and trace metals were present in minute quantities and were required to be listed as contained in the process waste.

The analysis of the water portion of the sludge for years 1974, 1975, 1976 are as follows:

| <u>Metal</u> | <u>Quantity</u> |
|------------------------|-----------------|
| Arsenic | <0.03 ppm |
| Selenium | <0.17 ppm |
| Antimony | No analysis |
| Mercury | <.01 ppm |
| Iron | <4.8 ppm |
| Manganese | <1.5 ppm |
| Magnesium | <12.8 ppm |
| Zinc | <6.9 ppm |
| Cadmium | <0.11 ppm |
| Copper | <1 ppm |
| Chromium | <0.75 ppm |
| Chromium ⁺⁶ | No analysis |
| Lead | <1.6 ppm |
| Organics | |
| Oil & Oil Sludge | <3.2 ppm |

Facility Name: Baker and Adamson Works

Site Name: Kin Buc

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

| | | |
|--|---|------|
| Acid solutions, with pH < 3 | 2 | (10) |
| pickling liquor | 2 | (11) |
| metal plating waste | 2 | (12) |
| circuit etchings | 2 | (13) |
| inorganic acid manufacture | 2 | (14) |
| organic acid manufacture | 2 | (15) |
| Base solutions, with pH > 10-12 | 2 | (16) |
| caustic soda manufacture | 2 | (17) |
| nylon and similar polymer generation | 2 | (18) |
| scrubber residual | 2 | (19) |
| Heavy metals & trace metals (bonded organically or inorganically) | 1 | (20) |
| arsenic, selenium, antimony | 1 | (21) |
| mercury | 1 | (22) |
| iron, manganese, magnesium | 1 | (23) |
| zinc, cadmium, copper, chromium (trivalent) | 1 | (24) |
| chromium (hexavalent) | 1 | (25) |
| lead | 1 | (26) |
| Radioactive residues, > 50 pico curies/liter ^{GRAM} | 9 | (27) |
| uranium residuals & residuals for UF ₆ recycling | 9 | (28) |
| lathanide series elements and rare earth salts | 9 | (29) |
| phosphate slag | 9 | (30) |
| thorium | 9 | (31) |
| radium | 9 | (32) |
| other alpha, beta & gamma emitters | 9 | (33) |
| Organics | 1 | (34) |
| pesticides & intermediates | 9 | (35) |
| herbicides & intermediates | 9 | (36) |
| fungicides & intermediates | 9 | (37) |
| rodenticides & intermediates | 9 | (38) |
| halogenated aliphatics | 9 | (39) |
| halogenated aromatics | 9 | (40) |
| acrylates & latex emulsions | 9 | (41) |
| PCB/PBB's | 9 | (42) |
| amides, amines, imides | 9 | (43) |
| plastizers | 9 | (44) |
| resins | 9 | (45) |
| elastomers | 9 | (46) |
| solvents polar (except water) | 9 | (47) |
| carbontetrachloride | 9 | (48) |
| trichloroethylene | 9 | (49) |
| other solvents nonpolar | 9 | (50) |
| solvents halogenated aliphatic | 9 | (51) |
| solvents halogenated aromatic | 9 | (52) |
| oils and oil sludges | 9 | (53) |
| esters and ethers | 9 | (54) |
| alcohols | 9 | (55) |
| ketones & aldehydes | 9 | (56) |
| dioxins | 9 | (57) |
| Inorganics | 1 | (58) |
| salts | 1 | (59) |
| mercaptans | 9 | (60) |
| Misc. | 9 | (61) |
| pharmaceutical wastes | 9 | (62) |
| paints & pigments | 9 | (63) |
| catalysts (eg. vanadium, platinum, palladium) | 9 | (64) |
| asbestos | 9 | (65) |
| shock sensitive wastes (eg. nitrated toluenes) | 2 | (66) |
| air water reactive wastes (eg. P ₄ , aluminum chloride) | 2 | (67) |
| wastes with flash point below 100° F. | 9 | (68) |

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: Allied Chemical Corporation
Facility Name: Baker and Adamson Works
Name of Site: Sweeney Landfill
Address of Site: don't know
no. street
city state zip code
Brookhaven Pennsylvania

Name of Owner (while used by facility): don't know
Address: don't know
no. street
city state zip code

Current Owner (if different from above): don't know
Address: don't know
no. street
city state zip code

1. Location (1= the property on which facility is located; 2= off-site)..... 2 (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership) 2 (11)
3. Current status (1= closed; 2= still in use; 9=don't know) 1 (12)
IF CLOSED, specify year closed 1974 (13-14)
4. Year first used for process waste from this facility 1964 (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) 1974 (17-18)
6. Total amount of process waste from this facility disposed at site:
thousand gallons 1 1 1 1 1 1 (19-26)
hundred tons 1 1 1 1 1 1 3 (27-33)
thousand cubic yards 1 1 1 1 1 1 1 (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)
landfill, mono industrial waste 2 (42)
landfill, mixed industrial waste 2 (43)
landfill, drummed waste 2 (44)
landfill, municipal refuse co-disposed ... 2 (45)
pits/ponds/lagoons 9 (46)
deep well injection 9 (47)
land farming 9 (48)
incineration 9 (49)
treatment (eg. neutralizing)..... 9 (50)
reprocessing/recycling 9 (51)
other (specify) 9 (52)
8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) 19 (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

Heavy Metals and Trace Metals (Items 20 to 26)

Although the process wastes were not analyzed for metals, unused portions of samples used for laboratory analysis were included in the material sent to the landfill. However, the amount of Heavy Metals that may have been included would be estimated to be less than 0.5%, due to the type of products manufactured at B&A Works.

Facility Name: Baker and Adamson Works

Site Name: Sweeney Landfill

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

| | | |
|--|---|------|
| Acid solutions, with pH < 3..... | 2 | (10) |
| pickling liquor | 2 | (11) |
| metal plating waste | 2 | (12) |
| circuit etchings | 2 | (13) |
| inorganic acid manufacture | 2 | (14) |
| organic acid manufacture | 2 | (15) |
| Base solutions, with pH > 10 ¹² | 2 | (16) |
| caustic soda manufacture | 2 | (17) |
| nylon and similar polymer generation | 2 | (18) |
| scrubber residual | 2 | (19) |
| Heavy metals & trace metals (bonded organically or inorganically) | 1 | (20) |
| arsenic, selenium, antimony | 1 | (21) |
| mercury | 1 | (22) |
| iron, manganese, magnesium | 1 | (23) |
| zinc, cadmium, copper, chromium (trivalent) | 1 | (24) |
| chromium (hexavalent) | 9 | (25) |
| lead | 1 | (26) |
| Radioactive residues, > 20 pico curies/liter ^{gamma} | 9 | (27) |
| uranium residuals & residuals for UF ₆ recycling | 9 | (28) |
| lanthanide series elements and rare earth salts | 9 | (29) |
| phosphate slag | 9 | (30) |
| thorium | 9 | (31) |
| radium | 9 | (32) |
| other alpha, beta & gamma emitters | 9 | (33) |
| Organics..... | 1 | (34) |
| pesticides & intermediates | 9 | (35) |
| herbicides & intermediates | 9 | (36) |
| fungicides & intermediates | 9 | (37) |
| rodenticides & intermediates | 9 | (38) |
| halogenated aliphatics | 9 | (39) |
| halogenated aromatics | 9 | (40) |
| acrylates & latex emulsions | 9 | (41) |
| PCB/PBB's | 9 | (42) |
| amides, amines, imides | 9 | (43) |
| plastizers | 9 | (44) |
| resins | 9 | (45) |
| elastomers | 9 | (46) |
| solvents polar (except water) | 9 | (47) |
| carbontetrachloride | 9 | (48) |
| trichloroethylene | 9 | (49) |
| other solvents nonpolar | 9 | (50) |
| solvents halogenated aliphatic..... | 9 | (51) |
| solvents halogenated aromatic | 9 | (52) |
| oils and oil sludges | 9 | (53) |
| esters and ethers | 9 | (54) |
| alcohols | 9 | (55) |
| ketones & aldehydes | 9 | (56) |
| dioxins | 9 | (57) |
| Inorganics | 1 | (58) |
| salts | 1 | (59) |
| mercaptans | 9 | (60) |
| Misc..... | 9 | (61) |
| pharmaceutical wastes | 9 | (62) |
| paints & pigments | 9 | (63) |
| catalysts (eg. vanadium, platinum, palladium) | 9 | (64) |
| asbestos | 9 | (65) |
| shock sensitive wastes (eg. nitrated toluenes) | 9 | (66) |
| air water reactive wastes (eg. P ₄ , aluminum chloride) | 9 | (67) |
| wastes with flash point below 100° F..... | 2 | (68) |

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: Allied Chemical Corporation
Facility Name: Baker and Adamson Works
Name of Site: Baker and Adamson Works
Address of Site: Wilmington Turnpike
no. street
Marcus Hook, Pennsylvania 19061
city state zip code
Name of Owner (while used by facility): Allied Chemical Corporation
Address: P. O. Box 1057R
no. street
Morristown, New Jersey 07960
city state zip code
Current Owner (if different from above): Same as above
Address: _____
no. street

city state zip code

1. Location (1= the property on which facility is located; 2= off-site)..... 1 (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership) 1 (11)
3. Current status (1= closed; 2= still in use; 9=don't know) 1 (12)
IF CLOSED, specify year closed 197 (13-14)
4. Year first used for process waste from this facility 195 (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) 197 (17-18)
6. Total amount of process waste from this facility disposed at site:
thousand gallons 1 1 1 1 1 1 (19-26)
hundred tons 1 1 1 1 1 1 1 0 (27-33)
thousand cubic yards 1 1 1 1 1 1 1 1 (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)
landfill, mono industrial waste 2 (42)
landfill, mixed industrial waste 2 (43)
landfill, drummed waste 2 (44)
landfill, municipal refuse co-disposed ... 3 (45)
pits/ponds/lagoons 1 (46)
deep well injection 3 (47)
land farming 3 (48)
incineration 3 (49)
treatment (eg. neutralizing)..... 1 (50)
reprocessing/recycling 1 (51)
other (specify) 9 (52)
8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) 2 (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

Allied Chemical Corp., Elizabeth Works
100 North Avenue, East
Elizabeth, NJ 07201

Facility Name: Baker and Adamson Works

Site Name: Same as above

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

| | | |
|--|---|------|
| Acid solutions, with pH < 3..... | 1 | (10) |
| pickling liquor | 2 | (11) |
| metal plating waste | 2 | (12) |
| circuit etchings | 2 | (13) |
| inorganic acid manufacture | 2 | (14) |
| organic acid manufacture | 1 | (15) |
| Base solutions, with pH > 12..... | 9 | (16) |
| caustic soda manufacture | 2 | (17) |
| nylon and similar polymer generation | 2 | (18) |
| scrubber residual | 2 | (19) |
| Heavy metals & trace metals (bonded organically or inorganically) | 1 | (20) |
| arsenic, selenium, antimony | 1 | (21) |
| mercury | 1 | (22) |
| iron, manganese, magnesium | 1 | (23) |
| zinc, cadmium, copper, chromium (trivalent) | 1 | (24) |
| chromium (hexavalent) | 9 | (25) |
| lead | 1 | (26) |
| Radioactive residues, > 30 pico curies/liter GRAM | 9 | (27) |
| uranium residuals & residuals for UF ₆ recycling | 9 | (28) |
| lanthanide series elements and rare earth salts | 9 | (29) |
| phosphate slag | 9 | (30) |
| thorium | 9 | (31) |
| radium | 9 | (32) |
| other alpha, beta & gamma emitters | 9 | (33) |
| Organics | 1 | (34) |
| pesticides & intermediates | 1 | (35) |
| herbicides & intermediates | 9 | (36) |
| fungicides & intermediates | 9 | (37) |
| rodenticides & intermediates | 9 | (38) |
| halogenated aliphatics | 1 | (39) |
| halogenated aromatics | 1 | (40) |
| acrylates & latex emulsions | 9 | (41) |
| PCB/PBB's | 9 | (42) |
| amides, amines, imides | 9 | (43) |
| plastizers | 9 | (44) |
| resins | 9 | (45) |
| elastomers | 9 | (46) |
| solvents polar (except water) | 1 | (47) |
| carbontetrachloride | 1 | (48) |
| trichloroethylene | 1 | (49) |
| other solvents nonpolar | 1 | (50) |
| solvents halogenated aliphatic..... | 1 | (51) |
| solvents halogenated aromatic | 1 | (52) |
| oils and oil sludges | 9 | (53) |
| esters and ethers | 9 | (54) |
| alcohols | 1 | (55) |
| ketones & aldehydes | 1 | (56) |
| dioxins | 9 | (57) |
| Inorganics | 1 | (58) |
| salts | 1 | (59) |
| mercaptans | 1 | (60) |
| Misc..... | 9 | (61) |
| pharmaceutical wastes | 9 | (62) |
| paints & pigments | 9 | (63) |
| catalysts (eg. vanadium, platinum, palladium) | 9 | (64) |
| asbestos | 9 | (65) |
| shock sensitive wastes (eg. nitrated toluenes) | 9 | (66) |
| air water reactive wastes (eg. P ₄ , aluminum chloride) | 9 | (67) |
| wastes with flash point below 100° F..... | 9 | (68) |

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: Allied Chemical Corporation
Facility Name: Baker and Adamson Works
Name of Site: Kinsley Landfill
Address of Site:

no. street
Deptford, New Jersey
city state zip code

Name of Owner (while used by facility): don't know

Address: no. street

city state zip code

Current Owner (if different from above): don't know

Address: no. street

city state zip code

1. Location (1= the property on which facility is located; 2= off-site)..... 2 (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership) 2 (11)
3. Current status (1= closed; 2= still in use; 9=don't know) 9 (12)
IF CLOSED, specify year closed 19 (13-14)
4. Year first used for process waste from this facility 1971 (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) 1974 (17-18)
6. Total amount of process waste from this facility disposed at site:
thousand gallons 1 1 1 1 1 (19-26)
hundred tons 1 1 1 1 1 5 (27-33)
thousand cubic yards 1 1 1 1 1 1 (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)
landfill, mono industrial waste 9 (42)
landfill, mixed industrial waste 9 (43)
landfill, drummed waste 9 (44)
landfill, municipal refuse co-disposed ... 9 (45)
pits/ponds/lagoons 9 (46)
deep well injection 9 (47)
land farming 9 (48)
incineration 9 (49)
treatment (eg. neutralizing)..... 9 (50)
reprocessing/recycling 9 (51)
other (specify) 9 (52)
8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) 9 (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

The process wastes sent to the landfill averages approximately 75% water and 25% solids. The Heavy Metals and Trace Metals were present in minute quantities and were required to be listed as contained in the process waste.

Analysis of the water portion for January, February and March, 1973 is as follows:

| <u>Metal</u> | <u>Quantity</u> |
|------------------------|-----------------|
| Arsenic | <0.01 |
| Selenium | No analysis |
| Antimony | No analysis |
| Mercury | <0.0006 ppm |
| Iron | <9.1 ppm |
| Manganese | <1.4 ppm |
| Magnesium | No analysis |
| Zinc | <2.3 ppm |
| Cadmium | No analysis |
| Copper | <0.027 ppm |
| Chromium | <1.2 ppm |
| Chromium ⁺⁶ | No analysis |
| Lead | <0.3 ppm |

Facility Name: Baker and Adamson Works

Site Name: Kinsley Landfill

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

| | | |
|--|---|------|
| Acid solutions, with pH < 3..... | 2 | (10) |
| pickling liquor | 2 | (11) |
| metal plating waste | 2 | (12) |
| circuit etchings | 2 | (13) |
| inorganic acid manufacture | 2 | (14) |
| organic acid manufacture | 2 | (15) |
| Base solutions, with pH > 10 ¹² | 2 | (16) |
| caustic soda manufacture | 2 | (17) |
| nylon and similar polymer generation | 2 | (18) |
| scrubber residual | 2 | (19) |
| Heavy metals & trace metals (bonded organically or inorganically) | 1 | (20) |
| arsenic, selenium, antimony | 1 | (21) |
| mercury | 1 | (22) |
| iron, manganese, magnesium | 1 | (23) |
| zinc, cadmium, copper, chromium (trivalent) | 1 | (24) |
| chromium (hexavalent) | 9 | (25) |
| lead | 1 | (26) |
| Radioactive residues, > 30 pico curies/liter GRAM | 9 | (27) |
| uranium residuals & residuals for UF ₆ recycling | 9 | (28) |
| lanthanide series elements and rare earth salts | 9 | (29) |
| phosphate slag | 9 | (30) |
| thorium | 9 | (31) |
| radium | 9 | (32) |
| other alpha, beta & gamma emitters | 9 | (33) |
| Organics..... | 9 | (34) |
| pesticides & intermediates | 9 | (35) |
| herbicides & intermediates | 9 | (36) |
| fungicides & intermediates | 9 | (37) |
| rodenticides & intermediates | 9 | (38) |
| halogenated aliphatics | 9 | (39) |
| halogenated aromatics | 9 | (40) |
| acrylates & latex emulsions | 9 | (41) |
| PCB/PBB's | 9 | (42) |
| amides, amines, imides | 9 | (43) |
| plastizers | 9 | (44) |
| resins | 9 | (45) |
| elastomers | 9 | (46) |
| solvents polar (except water) | 9 | (47) |
| carbontetrachloride | 9 | (48) |
| trichloroethylene | 9 | (49) |
| other solvents nonpolar | 9 | (50) |
| solvents halogenated aliphatic..... | 9 | (51) |
| solvents halogenated aromatic | 9 | (52) |
| oils and oil sludges | 9 | (53) |
| esters and ethers | 9 | (54) |
| alcohols | 9 | (55) |
| ketones & aldehydes | 9 | (56) |
| dioxins | 9 | (57) |
| Inorganics | 1 | (58) |
| salts | 1 | (59) |
| mercaptans | 9 | (60) |
| Misc..... | 9 | (61) |
| pharmaceutical wastes | 9 | (62) |
| paints & pigments | 9 | (63) |
| catalysts (eg. vanadium, platinum, palladium) | 9 | (64) |
| asbestos | 9 | (65) |
| shock sensitive wastes (eg. nitrated toluenes) | 2 | (66) |
| air water reactive wastes (eg. P ₄ , aluminum chloride) | 2 | (67) |
| wastes with flash point below 100° F..... | 9 | (68) |

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: Allied Chemical Corporation
Facility Name: Baker and Adamson Works
Name of Site: Concord Township Landfill
Address of Site: don't know

no. street
Elam, Pennsylvania
city state zip code

Name of Owner (while used by facility): Concord Township
Address: don't know

no. street
city state zip code

Current Owner (if different from above): don't know
Address: don't know

no. street
city state zip code

1. Location (1= the property on which facility is located; 2= off-site)..... 2 (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership) 3 (11)
3. Current status (1= closed; 2= still in use; 9=don't know) 1 (12)
IF CLOSED, specify year closed 1969 (13-14)
4. Year first used for process waste from this facility 1964 (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) 1969 (17-18)
6. Total amount of process waste from this facility disposed at site:
thousand gallons (19-26)
hundred tons 8 (27-35)
thousand cubic yards (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)
landfill, mono industrial waste 9 (42)
landfill, mixed industrial waste 2 (43)
landfill, drummed waste 9 (44)
landfill, municipal refuse co-disposed ... 2 (45)
pits/ponds/lagoons 9 (46)
deep well injection 9 (47)
land farming 9 (48)
incineration 9 (49)
treatment (eg. neutralizing)..... 9 (50)
reprocessing/recycling 9 (51)
other (specify) 9 (52)
8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) 9 (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

The only process waste sent to the landfill were the still bottoms from the distillation of Dichloroacetaldehyde. The Dichloroacetaldehyde was purchased and not manufactured at B&A Works. The composition of the process wastes were 30% Dichloroacetaldehyde residues and 70% Sulfuric Acid

Facility Name: Baker and Adamson Works

Site Name: Concord Township Landfill

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

| | | |
|--|---|------|
| Acid solutions, with pH < 3..... | 1 | (10) |
| pickling liquor | 2 | (11) |
| metal plating waste | 2 | (12) |
| circuit etchings | 2 | (13) |
| inorganic acid manufacture | 2 | (14) |
| organic acid manufacture | 2 | (15) |
| Base solutions, with pH > 10-12..... | 2 | (16) |
| caustic soda manufacture | 2 | (17) |
| nylon and similar polymer generation | 2 | (18) |
| scrubber residual | 2 | (19) |
| Heavy metals & trace metals (bonded organically or inorganically) | 9 | (20) |
| arsenic, selenium, antimony | 9 | (21) |
| mercury | 9 | (22) |
| iron, manganese, magnesium | 9 | (23) |
| zinc, cadmium, copper, chromium (trivalent) | 9 | (24) |
| chromium (hexavalent) | 9 | (25) |
| lead | 9 | (26) |
| Radioactive residues, > 50 pico curies/liter GRAM | 9 | (27) |
| uranium residuals & residuals for UF ₆ recycling | 9 | (28) |
| lanthanide series elements and rare earth salts | 9 | (29) |
| phosphate slag | 9 | (30) |
| thorium | 9 | (31) |
| radium | 9 | (32) |
| other alpha, beta & gamma emitters | 9 | (33) |
| Organics..... | 1 | (34) |
| pesticides & intermediates | 9 | (35) |
| herbicides & intermediates | 9 | (36) |
| fungicides & intermediates | 9 | (37) |
| rodenticides & intermediates | 9 | (38) |
| halogenated aliphatics | 1 | (39) |
| halogenated aromatics | 9 | (40) |
| acrylates & latex emulsions | 9 | (41) |
| PCB/PBB's | 9 | (42) |
| amides, amines, imides | 9 | (43) |
| plastizers | 9 | (44) |
| resins | 9 | (45) |
| elastomers | 9 | (46) |
| solvents polar (except water) | 9 | (47) |
| carbontetrachloride | 9 | (48) |
| trichloroethylene | 9 | (49) |
| other solvents nonpolar | 9 | (50) |
| solvents halogenated aliphatic..... | 1 | (51) |
| solvents halogenated aromatic | 9 | (52) |
| oils and oil sludges | 9 | (53) |
| esters and ethers | 9 | (54) |
| alcohols | 9 | (55) |
| ketones & aldehydes | 9 | (56) |
| dioxins | 9 | (57) |
| Inorganics | 1 | (58) |
| salts | 1 | (59) |
| mercaptans | 9 | (60) |
| Misc..... | 9 | (61) |
| pharmaceutical wastes | 9 | (62) |
| paints & pigments | 9 | (63) |
| catalysts (eg. vanadium, platinum, palladium) | 9 | (64) |
| asbestos | 9 | (65) |
| shock sensitive wastes (eg. nitrated toluenes) | 9 | (66) |
| air water reactive wastes (eg. P ₄ , aluminum chloride) | 9 | (67) |
| wastes with flash point below 100° F..... | 9 | (68) |

(11)
8-11-78
47

The process wastes sent to the landfill averages approximately 75% water and 25% solids. The Heavy Metals and Trace Metals were present in minute quantities and were required to be listed as contained in the process waste.

Analysis of the water portion of the sludge for year 1978 are as follows:

| <u>Metal</u> | <u>Quantity</u> |
|------------------------|-----------------|
| Arsenic | <0.03 ppm* |
| Selenium | <0.05 ppm* |
| Antimony | No analysis* |
| Mercury | <0.0003 ppm* |
| Iron | <0.9 ppm |
| Manganese | <1.6 ppm |
| Magnesium | <8.4 ppm |
| Zinc | <0.4 ppm |
| Cadmium | <0.04 ppm |
| Copper | <0.9 ppm |
| Chromium | <0.1 ppm |
| Chromium ⁺⁶ | <0.02 ppm |
| Lead | <0.3 ppm |

*Not used in manufacturing processes.

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: Allied Chemical Corporation
Facility Name: Baker and Adamson Works
Name of Site: Geological Reclamation Operations & Waste Systems, Inc.
Address of Site: Bordentown and New Ford Mill Road (GROWS)

no. street
Morrisville, Pennsylvania 19067
city state zip code

Name of Owner (while used by facility): R. D. Ragsdale, Jr.
Address: P. O. Box 180

no. street
Morrisville, Pa. 19067
city state zip code

Current Owner (if different from above):
Address: no. street
city state zip code

1. Location (1= the property on which facility is located; 2= off-site)..... 2 (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership) 2 (11)
3. Current status (1= closed; 2= still in use; 9=don't know) 2 (12)
IF CLOSED, specify year closed 197 (13-14)
4. Year first used for process waste from this facility 19716 (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) 19719 (17-18)
6. Total amount of process waste from this facility disposed at site:
thousand gallons 111111 (19-26)
hundred tons 1111115 (27-33)
thousand cubic yards 111111 (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)
landfill, mono industrial waste 9 (42)
landfill, mixed industrial waste 1 (43)
landfill, drummed waste 1 (44)
landfill, municipal refuse co-disposed ... 9 (45)
pits/ponds/lagoons 9 (46)
deep well injection 9 (47)
land farming 9 (48)
incineration 9 (49)
treatment (eg. neutralizing)..... 9 (50)
reprocessing/recycling 9 (51)
other (specify)..... 9 (52)
8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) 9 (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

Analysis of the water portion of the sludge for year 1978 are as follows:

| <u>Organic</u> | <u>Quantity</u> |
|----------------------|-----------------|
| Carbon Tetrachloride | < 0.01 ppm* |
| Trichloroethylene | < 0.01 ppm |
| Oil and Grease | < 21.6 ppm |
| Dichlorobenzene | < 0.2 ppm |
| Genesolv® D | < 0.27 ppm |
| Chloroform | < 0.025 ppm* |
| Tetrachloroethylene | < 0.04 ppm |
| Methylene Chloride | < 0.05 ppm |

*Not used in manufacturing processes.

One sample of the sludge (dry basis) was run in year 1976. The results are as follows:

| <u>Metal</u> | <u>Quantity</u> |
|------------------------|-----------------|
| Arsenic | No analysis* |
| Selenium | No analysis* |
| Antimony | No analysis* |
| Mercury | 1.5 ppm |
| Iron | 1% |
| Manganese | 0.3% |
| Magnesium | 0.7% |
| Zinc | 0.01% |
| Cadmium | 7 ppm |
| Copper | 0.07% |
| Chromium ⁺³ | 0.2% |
| Chromium ⁺⁶ | No analysis* |
| Lead | 0.4% |

*Not used in manufacturing processes.

Facility Name: Baker and Adamson Works

Site Name: GROWS

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

| | | |
|--|---|------|
| Acid solutions, with pH < 3 | 2 | (10) |
| pickling liquor | 2 | (11) |
| metal plating waste | 2 | (12) |
| circuit etchings | 2 | (13) |
| inorganic acid manufacture | 2 | (14) |
| organic acid manufacture | 2 | (15) |
| Base solutions, with pH > 10 | 2 | (16) |
| caustic soda manufacture | 2 | (17) |
| nylon and similar polymer generation | 2 | (18) |
| scrubber residual | 2 | (19) |
| Heavy metals & trace metals (bonded organically or inorganically) | 2 | (20) |
| arsenic, selenium, antimony | 1 | (21) |
| mercury | 1 | (22) |
| iron, manganese, magnesium | 1 | (23) |
| zinc, cadmium, copper, chromium (trivalent) | 1 | (24) |
| chromium (hexavalent) | 1 | (25) |
| lead | 1 | (26) |
| Radioactive residues, > 50 pico curies/liter | 9 | (27) |
| uranium residuals & residuals for UF ₆ recycling | 9 | (28) |
| lanthanide series elements and rare earth salts | 9 | (29) |
| phosphate slag | 9 | (30) |
| thorium | 9 | (31) |
| radium | 9 | (32) |
| other alpha, beta & gamma emitters | 9 | (33) |
| Organics | 1 | (34) |
| pesticides & intermediates | 9 | (35) |
| herbicides & intermediates | 9 | (36) |
| fungicides & intermediates | 9 | (37) |
| rodenticides & intermediates | 9 | (38) |
| halogenated aliphatics | 1 | (39) |
| halogenated aromatics | 1 | (40) |
| acrylates & latex emulsions | 9 | (41) |
| PCB/PBB's | 9 | (42) |
| amides, amines, imides | 9 | (43) |
| plastizers | 9 | (44) |
| resins | 9 | (45) |
| elastomers | 9 | (46) |
| solvents polar (except water) | 9 | (47) |
| carbontetrachloride | 1 | (48) |
| trichloroethylene | 1 | (49) |
| other solvents nonpolar | 9 | (50) |
| solvents halogenated aliphatic | 1 | (51) |
| solvents halogenated aromatic | 1 | (52) |
| oils and oil sludges | 1 | (53) |
| esters and ethers | 9 | (54) |
| alcohols | 9 | (55) |
| ketones & aldehydes | 9 | (56) |
| dioxins | 9 | (57) |
| Inorganics | 1 | (58) |
| salts | 1 | (59) |
| mercaptans | 9 | (60) |
| Misc | 9 | (61) |
| pharmaceutical wastes | 9 | (62) |
| paints & pigments | 9 | (63) |
| catalysts (eg. vanadium, platinum, palladium) | 9 | (64) |
| asbestos | 9 | (65) |
| shock sensitive wastes (eg. nitrated toluenes) | 2 | (66) |
| air water reactive wastes (eg. P ₄ , aluminum chloride) | 2 | (67) |
| wastes with flash point below 100° F. | 9 | (68) |

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: Allied Chemical Corporation
Facility Name: Baker and Adamson Works
Name of Site: Knickerbocker Sanitary Landfill
Address of Site: Box 456

no. street

Malvern, Pennsylvania 19355
city state zip code

Name of Owner (while used by facility): don't know
Address: _____

no. street

city state zip code

Current Owner (if different from above): don't know
Address: _____

no. street

city state zip code

1. Location (1= the property on which facility is located; 2= off-site) 2 (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership) 2 (11)
3. Current status (1= closed; 2= still in use; 9=don't know) 2 (12)
IF CLOSED, specify year closed 19 7 (13-14)
4. Year first used for process waste from this facility 19 7 (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) 19 7 (17-18)
6. Total amount of process waste from this facility disposed at site:
thousand gallons 1 1 1 1 1 1 1 1 (19-26)
hundred tons 1 1 1 1 1 1 3 1 (27-33)
thousand cubic yards 1 1 1 1 1 1 1 1 (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)
landfill, mono industrial waste 9 (42)
landfill, mixed industrial waste 9 (43)
landfill, drummed waste 9 (44)
landfill, municipal refuse co-disposed ... 9 (45)
pits/ponds/lagoons 9 (46)
deep well injection 9 (47)
land farming 9 (48)
incineration 9 (49)
treatment (eg. neutralizing)..... 9 (50)
reprocessing/recycling 9 (51)
other (specify) 9 (52)
8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) 9 (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

The process wastes sent to the landfill averages approximately 75% water and 25% solids. The Heavy Metals and Trace Metals were present in minute quantities and were required to be listed as contained in the process waste.

Analysis of the water portion of the sludge for year 1978 are as follows:

| <u>Metal</u> | <u>Quantity</u> |
|------------------------|-----------------|
| Arsenic | < 0.03 ppm* |
| Selenium | < 0.05 ppm* |
| Antimony | No analysis* |
| Mercury | < 0.0003 ppm* |
| Iron | < 0.9 ppm |
| Manganese | < 1.6 ppm |
| Magnesium | < 8.4 ppm |
| Zinc | < 0.4 ppm |
| Cadmium | < 0.04 ppm |
| Copper | < 0.9 ppm |
| Chromium | < 0.1 ppm |
| Chromium ⁺⁶ | < 0.02 ppm |
| Lead | < 0.3 ppm |

*Not used in manufacturing process.

Analysis of the water portion of the sludge for year 1978 are as follows:

| <u>Organic</u> | <u>Quantity</u> |
|----------------------|-----------------|
| Carbon Tetrachloride | < 0.01 ppm* |
| Trichloroethylene | < 0.01 ppm |
| Oil and Grease | < 21.6 ppm |
| Dichlorobenzene | < 0.2 ppm |
| Genesolv® D | < 0.27 ppm |
| Chloroform | < 0.025 ppm* |
| Tetrachloroethylene | < 0.04 ppm |
| Methylene Chloride | < 0.05 ppm |

*Not used in manufacturing processes.

One sample of the sludge (dry basis) was run in year 1976. The results are as follows:

| <u>Metal</u> | <u>Quantity</u> |
|------------------------|-----------------|
| Arsenic | No analysis* |
| Selenium | No analysis* |
| Antimony | No analysis* |
| Mercury | 1.5 ppm |
| Iron | 1% |
| Manganese | 0.3% |
| Magnesium | 0.7% |
| Zinc | 0.01% |
| Cadmium | 7 ppm |
| Copper | 0.07% |
| Chromium ⁺³ | 0.2% |
| Chromium ⁺⁶ | No analysis* |
| Lead | 0.4% |

*Not used in manufacturing processes.

Facility Name: Baker and Adamson Works

Site Name: Knickerbocker

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

| | | |
|--|---|------|
| Acid solutions, with pH < 3 | 2 | (10) |
| pickling liquor | 2 | (11) |
| metal plating waste | 2 | (12) |
| circuit etchings | 2 | (13) |
| inorganic acid manufacture | 2 | (14) |
| organic acid manufacture | 2 | (15) |
| Base solutions, with pH > 10-12 | 2 | (16) |
| caustic soda manufacture | 2 | (17) |
| nylon and similar polymer generation | 2 | (18) |
| scrubber residual | 2 | (19) |
| Heavy metals & trace metals (bonded organically or inorganically) | 1 | (20) |
| arsenic, selenium, antimony | 1 | (21) |
| mercury | 1 | (22) |
| iron, manganese, magnesium | 1 | (23) |
| zinc, cadmium, copper, chromium (trivalent) | 1 | (24) |
| chromium (hexavalent) | 1 | (25) |
| lead | 1 | (26) |
| Radioactive residues, > 20 pico curies/liter gamma | 9 | (27) |
| uranium residuals & residuals for UF ₆ recycling | 9 | (28) |
| lathanide series elements and rare earth salts | 9 | (29) |
| phosphate slag | 9 | (30) |
| thorium | 9 | (31) |
| radium | 9 | (32) |
| other alpha, beta & gamma emitters | 9 | (33) |
| Organics | 1 | (34) |
| pesticides & intermediates | 9 | (35) |
| herbicides & intermediates | 9 | (36) |
| fungicides & intermediates | 9 | (37) |
| rodenticides & intermediates | 9 | (38) |
| halogenated aliphatics | 1 | (39) |
| halogenated aromatics | 1 | (40) |
| acrylates & latex emulsions | 9 | (41) |
| PCB/PBB's | 9 | (42) |
| amides, amines, imides | 9 | (43) |
| plastizers | 9 | (44) |
| resins | 9 | (45) |
| elastomers | 9 | (46) |
| solvents polar (except water) | 9 | (47) |
| carbontetrachloride | 1 | (48) |
| trichloroethylene | 1 | (49) |
| other solvents nonpolar | 9 | (50) |
| solvents halogenated aliphatic | 1 | (51) |
| solvents halogenated aromatic | 1 | (52) |
| oils and oil sludges | 1 | (53) |
| esters and ethers | 9 | (54) |
| alcohols | 9 | (55) |
| ketones & aldehydes | 9 | (56) |
| dioxins | 9 | (57) |
| Inorganics | 1 | (58) |
| salts | 1 | (59) |
| mercaptans | 9 | (60) |
| Misc. | 9 | (61) |
| pharmaceutical wastes | 9 | (62) |
| paints & pigments | 9 | (63) |
| catalysts (eg. vanadium, platinum, palladium) | 9 | (64) |
| asbestos | 9 | (65) |
| shock sensitive wastes (eg. nitrated toluenes) | 2 | (66) |
| air water reactive wastes (eg. P ₄ , aluminum chloride) | 2 | (67) |
| wastes with flash point below 100° F. | 9 | (68) |

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: Allied Chemical Corporation
Facility Name: Baker and Adamson Works
Name of Site: Chem Dyne Corporation
Address of Site: 500 Ford Blvd.

no. street

Hamilton, Ohio 45011
city state zip code

Name of Owner (while used by facility): Same
Address: _____

no. street

city state zip code

Current Owner (if different from above): _____
Address: _____

no. street

city state zip code

1. Location (1= the property on which facility is located; 2= off-site)..... 2 (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership) 2 (11)
3. Current status (1= closed; 2= still in use; 9=don't know) 9 (12)
IF CLOSED, specify year closed 197 (13-14)
4. Year first used for process waste from this facility 197 (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) 197 (17-18)
6. Total amount of process waste from this facility disposed at site:
thousand gallons 1 1 1 1 1 1 1 1 1 1 (19-26)
hundred tons 1 1 1 1 1 1 1 1 1 1 (27-35)
thousand cubic yards 1 1 1 1 1 1 1 1 1 1 (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)
landfill, mono industrial waste 9 (42)
landfill, mixed industrial waste 9 (43)
landfill, drummed waste 9 (44)
landfill, municipal refuse co-disposed ... 9 (45)
pits/ponds/lagoons 9 (46)
deep well injection 9 (47)
land farming 9 (48)
incineration 1 (49)
treatment (eg. neutralizing)..... 9 (50)
reprocessing/recycling 9 (51)
other (specify)..... 9 (52)
8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) 9 (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

Facility Name: Baker and Adamson Works

Site Name: Chem Dyne Corp.

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

| | | |
|--|---|------|
| Acid solutions, with pH < 3..... | 9 | (10) |
| pickling liquor | 2 | (11) |
| metal plating waste | 2 | (12) |
| circuit etchings | 2 | (13) |
| inorganic acid manufacture | 2 | (14) |
| organic acid manufacture | 2 | (15) |
| Base solutions, with pH > 10-12..... | 2 | (16) |
| caustic soda manufacture | 2 | (17) |
| nylon and similar polymer generation | 2 | (18) |
| scrubber residual | 2 | (19) |
| Heavy metals & trace metals (bonded organically or inorganically) | 9 | (20) |
| arsenic, selenium, antimony | 9 | (21) |
| mercury | 9 | (22) |
| iron, manganese, magnesium | 9 | (23) |
| zinc, cadmium, copper, chromium (trivalent) | 9 | (24) |
| chromium (hexavalent) | 9 | (25) |
| lead | 9 | (26) |
| Radioactive residues, > 50 pico curies/liter GRAM | 2 | (27) |
| uranium residuals & residuals for UF ₆ recycling | 2 | (28) |
| lanthanide series elements and rare earth salts | 2 | (29) |
| phosphate slag | 2 | (30) |
| thorium | 2 | (31) |
| radium | 2 | (32) |
| other alpha, beta & gamma emitters | 2 | (33) |
| Organics..... | 1 | (34) |
| pesticides & intermediates | 1 | (35) |
| herbicides & intermediates | 9 | (36) |
| fungicides & intermediates | 9 | (37) |
| rodenticides & intermediates | 9 | (38) |
| halogenated aliphatics | 9 | (39) |
| halogenated aromatics | 9 | (40) |
| acrylates & latex emulsions | 9 | (41) |
| PCB/PBB's | 9 | (42) |
| amides, amines, imides | 9 | (43) |
| plastizers | 9 | (44) |
| resins | 9 | (45) |
| elastomers | 9 | (46) |
| solvents polar (except water) | 9 | (47) |
| carbontetrachloride | 9 | (48) |
| trichloroethylene | 9 | (49) |
| other solvents nonpolar | 9 | (50) |
| solvents halogenated aliphatic..... | 9 | (51) |
| solvents halogenated aromatic | 9 | (52) |
| oils and oil sludges | 9 | (53) |
| esters and ethers | 9 | (54) |
| alcohols | 9 | (55) |
| ketones & aldehydes | 9 | (56) |
| dioxins | 9 | (57) |
| Inorganics | 9 | (58) |
| salts | 9 | (59) |
| mercaptans | 9 | (60) |
| Misc..... | 9 | (61) |
| pharmaceutical wastes | 2 | (62) |
| paints & pigments | 2 | (63) |
| catalysts (eg. vanadium, platinum, palladium) | 2 | (64) |
| asbestos | 9 | (65) |
| shock sensitive wastes (eg. nitrated toluenes) | 2 | (66) |
| air water reactive wastes (eg. P ₄ , aluminum chloride) | 9 | (67) |
| wastes with flash point below 100° F..... | 9 | (68) |

PROVIDE A COMPLETE LIST OF ALL FIRMS AND INDEPENDENT CONTRACTORS,
INCLUDING THE COMPANY AND ITS AFFILIATES AND SUBSIDIARIES, USED
TO REMOVE PROCESS WASTES FROM THIS FACILITY SINCE 1950.

Company Name: Allied Chemical Corporation

Facility Name: Baker and Adamson Works

| <u>Name of Firm or Contractor</u> | <u>Address</u> | <u>ICC # (If Known)</u> | <u>Years Used</u> |
|---|---|-----------------------------|-------------------|
| K.T. Railroad Equipment Company | Whippany, NJ | don't know | 1978 |
| Larber Trucking | Niagara Falls, NY | don't know | 1978-1979 |
| McAdoo Associates | McAdoo, PA | don't know | 1978 |
| Harvey and Harvey | Newport, Delaware | don't know | 1978 |
| East Coast Pollution Control Inc. | Cenco Blvd. P. O. Box 275 Clayton, NJ 08321 | don't know | 1977-1979 |
| Eastern Waste Removal | Deptford, NJ | don't know | 1972-1979 |
| Gene Banta Trash Removal | Box 59 Chester, PA 19016 | don't know | 1964-1979 |
| Pennsylvania Railroad (Penn Central) | 30th St. Station Phila., PA 19104 | - | 1976 |

Baker and Adamson Works

See above

ORIGINAL
(pg)

ATTACHMENT 2
DELAWARE VALLEY WORKS
CLAYMONT, DE



Chemicals Company
P.O. Box 1139R
Morristown, New Jersey 07960

RECEIVED JUN 19 1980

bcc: L. A. Mattioli
E. J. Shields
T. D. Kent
W. M. Reiter

DTM

June 13, 1980

Mr. Joseph J. C. Donovan, Attorney
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region III
Curtis Building
6th & Walnut Streets
Philadelphia, Pennsylvania 19106

RE: United States v. Melvin Wade, et al
Civil Action Number 79-1426
Eastern District of Pennsylvania

Dear Mr. Donovan:

Please refer to Mr. P. F. Vaira's letter of May 23, 1980 addressed to Mr. P. L. Brueckner, the Chemicals Company Delaware Plant Manager, requesting information with respect to possible dealings between our Company and ABM Disposal Company.

In your telephone conversation of June 2, 1980, with David Van Epps, it was agreed that we would review available records for plant locations within a distance of the ABM site which would indicate possible use, i.e., Pennsylvania, New Jersey, Maryland, and Delaware. Mr. Van Epps indicated at that time that our normal record retention policy for Morristown, NJ central files provides for destruction of purchase records after three years.

A review of the central purchasing files indicates no record of any business transaction with ABM, but these records go back only to 1978.

You may be aware that on May 27, 1980, we were notified by the City of Philadelphia of their intent to assess us and various other industries for the rehabilitation of property known as the Enterprise Avenue Landfill. According to the City, the illegal disposal of waste liquids both in drums and in bulk was conducted by ABM Disposal Company and Lightman Drum Company between 1974 and 1976. We have requested the City to assist us by providing any factual basis for their assessment.

June 13, 1980

Page 2

ORIGINAL
(Red)

Our review of Delaware Plant location purchasing files turned up information included in correspondence to the City of Philadelphia, dated April 6, 1979 (Attachment I) and June 12, 1979 (Attachment II). This information tended to confirm shipments to ABM from our Claymont, Delaware plant and possible use of that firm by our former Camden Plant.

In the correspondence, you will note the following references:

1. Attachment I - Three bulk shipments from the Claymont, Delaware plant in January and February, 1973 consigned to ABM, Inc. were composed of sodium sulfite/sulfate liquors, an oil/water mix from a sluiceway, and an oil/wastewater mix from a hydrofluoric acid operation. Although plant personnel believe these shipments were made, we are currently unable to locate documents to confirm this.
2. Attachment II - 1224 tons of phosphoric acid and phosphate residues shipped in bulk from Claymont, Delaware plant to ABM, Inc. during 1972 and 1973. Purchase Order No.21171, issued 4/17/72, (Attachment III) refers to the removal of 20,200 cubic feet of material which is equivalent to 1224 tons.

In addition, we have located Purchase Order No.23499, issued 10/27/72, with associated invoice (Attachment IV) indicating that an estimated 140 tons of 71% phosphoric acid were proposed to be shipped to ABM. We believe (based on the invoice) 92 tons of material were actually shipped during 1972 and 1973.

Additionally, we have asked that location purchasing records within the 4-state area be reviewed promptly. We will correspond further should additional information be obtained by these locations.

If you have any indication of use by Allied Chemical of the ABM site beyond the information noted above, please furnish this as an aid to our search.

We trust the information will be helpful in your investigation. If there are any questions, please call Mr. Van Epps at (201) 455-2457.

Very truly yours,

ALLIED CHEMICAL CORPORATION
Chemicals Company



G. Kanelis
Supervisor-Environmental Administration

GK/lal
Attachments

cc: P. L. Brueckner
H. D. Finkelstein
G. D. Van Epps



Attachment I
(1 of 2)

Industrial Chemicals Division
P.O. Box 1139R
Morristown, New Jersey 07960

April 6, 1979

Mr. Thomas Kulesza, Chief
Industrial Waste Unit
Water Pollution Control Division
1180 Municipal Services Building
Philadelphia, PA 19107

Re: ABM, Inc.

Dear Mr. Kulesza:

This is in reference to your phone call of several weeks ago to our Mr. L. A. Mattioli concerning our use of ABM inc. for waste disposal. This letter will also confirm Mr. Mattioli's phone call in response.

We believe that our former Camden, New Jersey facility utilized the services of ABM Inc. to remove trash and refuse. This belief is based on conversations with former employees at Camden. Since silicate production operations at Camden were terminated in May, 1975 and the facility sold in June, 1976, records are not readily available. Of the records reviewed, none indicate what type of material was removed by ABM Inc., or, indeed, even that ABM Inc. removed any material. However, as stated above, we feel that ABM Inc. was utilized in some trash and refuse removal from the Camden facility.

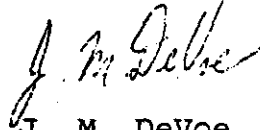
As Mr. Mattioli informed you, our "dead record" files have not been reviewed since we seriously doubt that these records would reveal any substantive information concerning the nature of the materials removed by ABM Inc. Therefore, we do not intend to extend our investigation into these files. In addition, we wish to point out that it is our belief that any information in these files would be limited to copies of purchase orders similar in content to those which you found in ABM Inc.'s records.

During our review of the records mentioned above, we found evidence that ABM Inc. was used for disposal of waste from our Claymont, Delaware plant. Our records indicate that in January and February, 1973 three bulk shipments were consigned to ABM Inc. These shipments were composed of sodium sulfite/sulfate liquors, an oil/water mix from a sluiceway and an oil/wastewater mix from a hydrofluoric acid operation. We have found no information indicating which dumpsite was used by ABM Inc. for these shipments.

Attachment I
(2 of 2)

Should you have further questions regarding this matter,
please contact me.

Very truly yours,



J. M. DeVoe
Assistant Director
Environmental Services

/ss

cc: L. A. Mattioli



Attachment II

Industrial Chemicals Division
P.O. Box 1139R
Morristown, New Jersey 07960

June 12, 1979

Mr. Thomas Kulesza, Chief
Industrial Waste Unit
Water Pollution Control Division
1180 Municipal Services Building
Philadelphia, PA 19107

Re: ABM, Inc.

Dear Mr. Kulesza:

This letter will confirm the information concerning shipments from Allied Chemical's Claymont Delaware Plant to ABM, Inc. that Mr. Leon Mattioli gave you by telephone yesterday.

Our letter of April 6, 1979 listed the shipments to ABM, Inc. indicated in plant records. Further searching of the records has uncovered a total of 1224 tons of Phosphoric Acid and phosphate residues shipped in bulk from the Claymont Delaware Plant to ABM, Inc. during 1972, 1973. We do not have information indicating which dumpsite was used by ABM, Inc. for these shipments.

If you have any further questions regarding these shipments, please contact me.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'J. M. DeVoe'.

J. M. DeVoe
Assistant Director
Environmental Services

JMD:MCM:cc



Corporation

AT

Attachment III
(2 of 2)

PURCHASE ORDER

NUMBER

CHANGE NO.

DDP-21171

| ITEM | QUANTITY ORDERED | DESCRIPTION | PRICE | QUANTITY RECEIVED |
|------|------------------|--|-------|-------------------|
| | | Contractor must comply with the terms and conditions of this purchase order and submit required certificates of insurance, in form satisfactory to the Buyer, to the undersigned prior to the start of work. | | |
| | | CONFIRMING | | |
| | | Remove contents of Phosphoric acid ponds 993-9010-555-510082-G25 Auth. Pickup | | |
| | | 5 | | |

Corporation

Attachment IV
(1 of 3)

PURCHASE ORDER

AT DELAWARE DISTRICT PURCHASING, HANCOCK HIDE, PA. 19641

| | | | | | |
|----------------------|---------------|---------------|---------------|-------------|---------------|
| SHIPPING SCHEDULE | DATE PROMISED | DATE REQUIRED | DATE OF ORDER | TERMS | NUMBER |
| | Start 10-28 | | 10-27-72 | Net 10 days | DDP- 23495 |
| F.O.B. & FREIGHT | | | | | CHANGE NUMBER |

01-23-24

SELLER

ABX Disposal Service Company
329 North Governor Printz Boulevard
Lester, Pennsylvania 19113

SHIP
TO
US
AT

Industrial Chemicals Division
Delaware Works
Laymont, Delaware 19703

INSTRUCTIONS

IMPORTANT - SEND NUMBER OF COPIES INDICATED TO ADDRESS
CHECKED OR INSERTED. IMPROPERLY ADDRESSED PAPERS MAY
BE RETURNED FOR CORRECTION.

| TO: | ACKNOWLED. COPIES | SHIP NOT. | B/L | INV. | CORP. |
|---------------------------------|----------------------|--------------|-----|------|-------|
| ABOVE ADDRESS | 1 | 1 | | | 2 |
| 40 RECTOR ST., N.Y., N.Y. 10006 | | | | | |
| "SHIP TO US AT" ADDRESS | | | | | |

INVOICE, IN TRIPLICATE,
TO SHIPPING LOCATION

SHIP VIA & ROUTING

STOREHOUSE ORDER ATTACHED.

REQUISITION NUMBER

Your equipment and service

6-10192

| ITEM | QUANTITY ORDERED | DESCRIPTION | PRICE | QUANTITY RECEIVED |
|------|------------------|--|-------------|-------------------|
| 1 | 1 Lot | <p>Material, labor, supervision, insurance, tools and facilities to remove and dispose liquid contents of two storage tanks located in north east corner of unit #1 Building of the Phosphate Dept. Liquid contents include an estimated 140 tons of 71% phosphoric. Contractor to supply all necessary pumps, lines, or hoses, etc. and transport and dispose of all liquid contents relieving Allied Chemical Corp. of all responsibility when trailers leave Department works.</p> <p>Contractor shall comply with the attached "Plant Safety Regulations for Contractors."</p> <p>Contractor must comply with the terms and conditions of this purchase order and submit required certificates of insurance, in form satisfactory to the Buyer, to the undersigned prior to the start of work.</p> <p style="text-align: center;">C O N F I R M I N G</p> | \$20.00/top | |

5

CHEMICAL COMPANY
ENVIRONMENTAL CONTROL

JUN 10 '82

| | INFO. ACT. | INFO. ACT. |
|------|-------------------------------------|-------------------------------------|
| RS | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| EIS | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| EFB | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| GB | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| JMD | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| DRF | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| FILE | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |

RET. TO

Phos. Dismantle Unit #1, 998-9003-786-00--G25 Auth. 06-786-Wright

| VENDOR CODE | | | | | | VOUCHER | | PAGE ____ OF ____ | | | | GROSS |
|---------------|----------------|------------------|-----------------|--------------------|------------------|-----------------------------------|----------|---|------------|-------------------------------------|-----------------------------|------------|
| | | | | | | MONTH | NUMBER | AUTHORIZED SIGNATURE OF BUYER <i>[Signature]</i> | | | | TARE |
| | | | | | | PAYMENT DATE | | RECEIVING REPORT NO. | PARTIAL | FINAL | NET | |
| ITEM | DIV. OR CO. | CONTROL MAJOR | CENTER MINOR | COST CENTER | ACCOUNT | JOB, PROD., R/M CODE | QUANTITY | DISTRIB. AMOUNT | CASH DISC. | VENDOR INVOICE NO. | REFERENCE * INVOICE DATE | ENC COD |
| | | | 11-7-72 | | 998-9008-786-02- | | | # 1890 | | 1451 | | |
| | | | | | | | | | | | | |
| | | | | | | | | | | | | |
| | | | | | | | | | | | | |
| | | | | | | | | | | | | |
| | | | | | | | | | | | | |
| | | | | | | | | | | | | |
| DATE UNLOADED | | DATE REPORTED | | CAR NO./CARRIER | | | F/B NO. | FREIGHT CHARGE | | RECEIVED BY | | APPROVED |
| WHERE PLACED | | | | EXTENSIONS CHECKED | | PLANT ACCOUNTING SIGNATURE - DATE | | | | VOUCHER APPROVED FOR PAYMENT - DATE | | |

* SHOW INVOICE NUMBER AT ALL TIMES. USE INVO
DATE ONLY WHEN NUMBER IS NOT AVAILABLE.



Corporation

AT

PURCHASE ORDER

| | | | | | | |
|----------------------|---------------|---------------|---------------|-------|-------------------------|-----------------|
| SHIPPING SCHEDULE | DATE PROMISED | DATE REQUIRED | DATE OF ORDER | TERMS | Attachment IV (2073) | NUMBER 23499 |
| O.B. & FREIGHT | | | | | | CHANGE NUMBER |

SELLER

ABM Disposal Service

SHIP
TO
US
AT

Dr. Medis-Stoopes-Pollard

INSTRUCTIONS
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| TO: | ACKNOWLEDGMENT COPIES | SHIP NOT. | B/L | INV. | COPY |
| ABOVE ADDRESS | | | | | |
| 40 RECTOR ST., N.Y., N.Y. 10006 | | | | | |
| "SHIP TO US AT" ADDRESS | | | | | |
| R-1#877 | | | | | |

SHIP VIA & ROUTING

The

REQUISITION NUMBER

6-10192

| ITEM | QUANTITY ORDERED | DESCRIPTION | PRICE | QUANTITY REC'D |
|-----------------|------------------|---|-------|----------------|
| 1 Lot | | Subs, etc. to be remove and dispose of 92 tons of sub. waste from 2 storage tanks N.E. corner of Unit #1 Bldg | | |
| OK - J. Grigste | | | | |
| Auth 06-786 | | | | |

| | | | | | | | | | | | | |
|------------|-------------|--------------------|--------------|-----------------------------------|----------------------|----------------------|----------------|-------------------------------------|------------|--------------------|------------------------|-----------|
| NDOR CODE | | VOUCHER | | PAGE OF | | | | GROSS | | | | |
| | | MONTH | NUMBER | AUTHORIZED SIGNATURE OF BUYER | | | | TARE | | | | |
| | | | | PAYMENT DATE | RECEIVING REPORT NO. | PARTIAL | FINAL | NET | | | | |
| M | DIV. OR CO. | CONTROL MAJOR | CENTER MINOR | COST CENTER | ACCOUNT | JOB, PROD., R/M CODE | QUANTITY | DISTRI. AMOUNT | CASH DISC. | VENDOR INVOICE NO. | REFERENCE INVOICE DATE | ENG. CODE |
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INVOICE

THE UNIVERSITY OF CHICAGO

Normal Post-Test

SECRET

66-786

06-786

© 1994

[illegible]

QUANTITY:

QUANTITY:

72

tons of industrial waste

PRICE

25.43

AMOUNT

4050

CHARGE TO

DATE

NOV - 8 1972

REC'D DELAWARE

NOV 3 1972

151

DISCOUNT

NY

ENTRY NO.

PRICE D. K.

EXTA 04-KW
7-2-2004

SHAW & FORDON & CO.

BAT

QUADRUPLICATE

Thank You



Corporation

AT DELAWARE DISTRICT PURCHASING, MARCUS WOOD, FA. 19641

PURCHASE ORDER

| | | | | | |
|-------------------|---------------|---------------|---------------|-------|---------------|
| SHIPPING SCHEDULE | DATE PROMISED | DATE REQUIRED | DATE OF ORDER | TERMS | NUMBER |
| | Week 11/6 | 11/7/72 | Net 30 days | | DDP- 23632 |
| F.O.B. & FREIGHT | | | | | CHANGE NUMBER |

Our Plant

S
E
L
L
E
R

Wright Construction Company
6516 Governor Printz Boulevard
Wilmington, Delaware 19809

Industrial Chemicals Division
Delaware Works
Claymont, Delaware 19703

SHIP
TO
US
AT

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| "SHIP TO US AT" ADDRESS | | | | | |

INVOICE, IN TRIPLICATE,
TO SHIPPING LOCATION

SHIP VIA & ROUTING

Your equipment and services

REQUISITION NUMBER

6-10243

| ITEM | QUANTITY ORDERED | DESCRIPTION | PRICE | QUANTITY REC |
|------|------------------|---|---------------|--------------|
| 1 | 1 Lot | <p>Remove approximately 400 tons of Phosphoric acid muds mixed with an equal quantity of cinder and dispose of in a pit on plant property. Muds to be removed from (2) two 23' dia. x 25' high brick lined storage tanks at the North end of the Phosphate Unit #1 Building. Each tank contains approximately 7' of phosphoric muds.</p> <p>Sufficient cinder to be added to the mud to produce a mix that can be easily handled. All mud/cinder mixture must be removed the same day it is mixed. The trucks handling the mixture are to have approximately 1 ft. of cinder on the bottom of the bed to prevent leakage onto roadways</p> <p>Tests indicate a ratio of 1 to 1 of mud to cinder is necessary</p> <p>Contractor to excavate a pit at a designate spot on the plant site. Bottom to have 1 ft. thick cinder lining on bottom, then the mud/cinder</p> | \$6500.00/Lot | |

| | | | | | | | | | | | | |
|---------------|-------------|--------------------|--------------|-----------------------------------|---------|----------------------|---|-------------------------------------|------------|-------------------------------|--------------|----------|
| VENDOR CODE | | | | | VOUCHER | | PAGE 1 OF 2 | | | | GROSS | |
| | | | | | MONTH | NUMBER | AUTHORIZED SIGNATURE OF BUYER | | | | TARE | |
| | | | | | | | E. H. CAGILL | | | | NET | |
| | | | | | | | PAYMENT DATE RECEIVING REPORT NO. PARTIAL FINAL | | | | | |
| ITEM | DIV. OR CO. | CONTROL MAJOR | CENTER MINOR | COST CENTER | ACCOUNT | JOB, PROD., R/M CODE | QUANTITY | DISTRIB. AMOUNT | CASH DISC. | VENDOR REFERENCE* INVOICE NO. | INVOICE DATE | |
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| DATE UNLOADED | | DATE REPORTED | | CAR NO./CARRIER | | F/B NO. | | FREIGHT CHARGE | | RECEIVED BY | | APPROVED |
| WHERE PLACED | | EXTENSIONS CHECKED | | PLANT ACCOUNTING SIGNATURE - DATE | | | | VOUCHER APPROVED FOR PAYMENT - DATE | | | | |

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Corporation

AT

CONTINUATION SHEET
PURCHASE ORDER

NUMBER

CHANGE NO.

DELAWARE DISTRICT PURCHASING, MARCUS ROSE, PA. 19061

DDP-23632

| ITEM | QUANTITY ORDERED | DESCRIPTION | PRICE | QUANTITY REC'D |
|---|------------------|---|-------|----------------|
| | | <p>mixture all covered with a 1' thick of cinder. Owner will supply cinder for contractor pickup from a designated pile.</p> <p>Contractor to supply all labor, supervision, material and equipment required for proper completion of above work.</p> <p>Contractor shall comply with the attached "Plant Safety Regulations for Contractor."</p> <p>Contractor must comply with the terms and conditions of this purchase order and submit required certificates of insurance, in form satisfactory to the Buyer, to the undersigned prior to the start of work.</p> | | |
| CONFIRMING | | | | |
| Phos. Dismantle Unit #1, 998-9003-786-00-025 Auth. Wright | | | | |



Corporation

AT

PURCHASE ORDER

| | | | | | |
|-------------------|---------------|---------------|---------------|-------|-----------------|
| SHIPPING SCHEDULE | DATE PROMISED | DATE REQUIRED | DATE OF ORDER | TERMS | NUMBER 23632 |
| F.O.B. & FREIGHT | | | | | CHANGE NUMBER |

SELLER

Bright Const. Co.

SHIP TO US AT

Bi-Medic Supply - Pollard

SHIP VIA & ROUTING

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| RI 954 | | | | | |

REQUISITION NUMBER

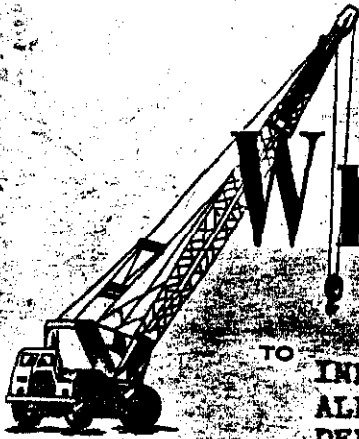
6-10243

| ITEM | QUANTITY ORDERED | DESCRIPTION | PRICE | QUANTITY REC'D |
|------|------------------|---|-------|----------------|
| 1 | 1 lot | Remove 400 tons of Chas. Muds Disassemble Unit #1 4 Auth - 06-786 ok'd by J. Wright | | |

| | | | | | | | | | | | | |
|---------------|-------------|--------------------|--------------|-----------------------------------|----------------------|----------------------|----------------|-------------------------------------|-------------|------------------------------|--------------|-----------|
| VENDOR CODE | | VOUCHER | | PAGE OF | | | | GROSS | | | | |
| | | MONTH | NUMBER | AUTHORIZED SIGNATURE OF BUYER | | | | TARE | | | | |
| | | | | PAYMENT DATE | RECEIVING REPORT NO. | PARTIAL | FINAL | NET | | | | |
| ITEM | DIV. OR CO. | CONTROL MAJOR | CENTER MINOR | COST CENTER | ACCOUNT | JOB, PROD., R/M CODE | QUANTITY | DISTRIB. AMOUNT | CASH DISC. | VENDOR REFERENCE INVOICE NO. | INVOICE DATE | ENG. CODE |
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| WHERE PLACED | | EXTENSIONS CHECKED | | PLANT ACCOUNTING SIGNATURE - DATE | | | | VOUCHER APPROVED FOR PAYMENT - DATE | | | | |

PARTIAL RECEIVING REPORT

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Wright

NO. 10953

CONSTRUCTION CO.

6515 GOVERNOR PRINTZ BLVD., WILMINGTON, DELAWARE 19809

TO
INDUSTRIAL CHEMICALS DIVISION
ALLIED CHEMICAL CORPORATION
DELAWARE WORKS
CLAYMONT DELAWARE 19703

DUPLICATE NOT FOR PAYMENT

| | | | | |
|----------------------|---|-----------------------------------|-------------|------------|
| ORDER NO. DDP 224 | REQUISITION NO. 6-10243 | INVOICE DATE November 20, 1972 | TERMS | |
| QUANTITY | DESCRIPTION FIXED CAPITAL ITEM G. O. 06-786 | UNIT PRICE | TOTAL PRICE | |
| | Furnished equipment and labor for removing approx. 400 tons of Phosphoric acid muds mixed with an equal quantity of cinder and dispose of in a pit on your plant property | | | |
| | Total Cost | | | \$6,500 00 |

REC'D DELAWARE NOV 27 1972

DISCOUNT _____ % BY _____ ENTRY NO. **1213**

PRICE S.E. _____ EXT. S.E. _____

QUAN. & SOURCE S.E. _____ DATE _____

CHARGE TO **798-9003-**

DATE **12/1/72**

786-02

DEC - 1 1972

DAVE M
one
 Allied
Chemical *Jan → [scribble] → file DVW ABM Solid Waste*
WJM

Law Department
P.O. Box 2245R
Morristown, New Jersey 07960

July 10, 1980

Howard D. Finkelstein
Assistant U.S. Attorney
Eastern District of Pennsylvania
3310 U.S. Court House
Philadelphia, PA 19106

CERTIFIED MAIL

Re: U.S. v. Melvin Wade, et al.
Civil Action No. 79-1426

Dear Mr. Finkelstein:

In response to your letters of May 23 and 29, 1980 and discussion by telephone with Joseph J. C. Donovan, Esq., Region III, Environmental Protection Agency, Allied Chemical undertook to aid your investigation of ABM by having our purchasing records reviewed for Pennsylvania, New Jersey, Delaware and Maryland for references to ABM, Lightman Drum Company and the Enterprise Landfill. We informed Mr. Donovan at that time that the corporate policy for retention of purchasing documents is to retain these for three years and then to discard them. As a precaution, in anticipation that this policy may not have been rigidly followed outside of the corporate headquarters, we requested the plants within the four state area to check for any purchasing records as far back as 1970. This search was done on an expedited basis.

When the above search was completed, Allied Chemical responded directly to Mr. Donovan by letter of June 13, 1980 to which you were a copyholder. Subsequently, on June 20th Mr. Donovan telephoned me to indicate receipt of the letter and to advise that certain other apparent transactions had occurred, in his view, between ABM and Allied Chemical. This information was summarized in his letter to me of June 26, 1980 (copy attached).

During the June 20th telephone discussion, Mr. Donovan indicated that he wished Allied plant representatives to appear for an interview with your office during the week of June 30th. This discussion was held on July 1, 1980 in your offices with Mr. Donovan and Mr. Harvey Paige, a chemist from E.P.A., Region III. In anticipation of assisting the Justice Department and Mr. Donovan in deciphering the purchase documents furnished by us in our letter of June 13th and to interpret as best as possible the documents Mr. Donovan claims to have indicating other transactions, we had undertaken a further check specifically aimed at the items indicated by Mr. Donovan in his telephone call. Unfortunately, his letter, dated June 26, 1980, was not received by my office until June 30, 1980 and a copy was given to me by Mr. Donovan at the interview on July 1st.

Mr. Donovan also asked on June 20th that the persons attending this interview be knowledgeable of the processes at the four plants identified by him as apparently having had some contact with ABM, i.e., Allied's Claymont, B&A, and Frankford plants and our former Camden Works. The persons attending the interview were in fact knowledgeable of these processes and prepared to address this question. The purpose of inquiring as to the processes was said on June 20th by Mr. Donovan to be to identify a "universe" of materials, products and potential wastes from these facilities which could have been removed by ABM. I asked Mr. Donovan at the time whether our providing such information created any implication that we had disposed of such materials through ABM (or in any way) and was advised that it did not. Mr. Donovan identified his purpose as simply to provide information which would be useful in the ABM litigation, U.S. v. Wade. He did say at that time that he could not rule out the possibility that any information provided by us would be used later in a suit against Allied Chemical as a generator of these materials but did not indicate that such a suit was contemplated.

Coming into the interview with this frame of reference, we believed that the purpose was to identify as best we could certain documents and, although it did not appear to us to be directly related to your ABM litigation, to describe the four plants in terms of process. We had in our letter of June 23, 1980 reserved any and all rights concerning this matter. This was done for two reasons. Mr. Donovan had stated the potential for a lawsuit and our attempted reconstruction of the possible transactions with ABM was necessarily uncertain in view, among other things, of the dates of these apparent transactions. For the record, we continue to reserve such rights.

Upon arriving in your offices in Philadelphia, the Justice Department was not present and Mr. Donovan conducted the interview.

The interview appeared to have very little to do with the ABM law suit.

We were not permitted to see the documents which we purportedly had been asked to identify. As Allied Chemical had not been indicated to be a target of your litigation this fact is puzzling. Instead Mr. Brueckner, the present Delaware Valley plant manager, was quizzed by Mr. Donovan regarding the identity of people in the plant in 1973-1976 who could conceivably have initiated or known of waste disposal without any references whatsoever to ABM. Mr. Donovan also began an inquiry regarding the plant division and corporate structure as to the responsibility of persons for disposal of waste.

After this line of inquiry had followed its course for some time, I asked Mr. Donovan if he would indicate the purpose of this interview as it appeared to me that the interview to that point had had nothing to do with the Justice Department investigation of ABM. I further indicated that the persons present were prepared to try to reconstruct as best they could what could have been involved in the transactions uncovered by Allied and other transactions indicated to us by Mr. Donovan.

Mr. Donovan responded that he viewed his inquiry as proper and if we were uncooperative, he would have no choice but to bring us into a lawsuit. - He carefully pointed out several times upon making such remarks that he did not intend them to be considered a "threat".

In view of the change in tenor of the interview from what we had believed to be its purpose, it was necessary to instruct our interviewees to address the apparent transactions with ABM and the plant processes.

Ultimately, the information provided by Allied in its letter of June 13th and the information provided by Mr. Donovan in his telephone call of June 20th and letter of June 26th was addressed.

It was at this point, that I inquired if we could see and/or have copies of the documents which we had been asked to address. We were told that we could not have access to these documents.

Mr. Brueckner reviewed the purchase orders to ABM concerning the demolition of the phosphate fertilizer plant included with our June 13th letter. He offered his judgment as to the types of materials removed. As to the purported purchase orders from the Claymont plant to ABM dated January 26, and February 5, 1973, referred to by Mr. Donovan, he believed these to be related to the clean up of spilled No. 6 and No. 2 fuel oil from within diked areas at the plant. He reported that the plant had been unable to locate copies of these purchase orders in the files. With respect to the referenced letter concerning three fluorine cylinders, Mr. Brueckner explained that, when this item had been checked, plant personnel had believed that such cylinders would not have been disposed of by Allied Chemical and, accordingly, looked in a file concerning the return of cylinders to Allied Chemical. They found a receipt for the return of three cylinders by ABM to Allied Chemical which was shown to Mr. Donovan (copy attached).

Concerning the Camden Works, Mr. Brueckner advised that he had worked in a similar facility with similar product lines and identified the nature of the materials manufactured and the raw materials. I reiterated the information furnished to the City of Philadelphia indicating that Allied had found no purchasing documents with ABM. It was believed, however, that ABM may have furnished trash pick-up services to the Camden works. Mr. Brueckner also noted that the facility had been shut down around 1975 and sold in 1976.

Mr. Bresland speaking with respect to the Frankford works indicated that during 1976, in connection with an operation at the plant which had been discontinued around 1971, certain storage tanks had been demolished and others reconditioned. Reconstructing from available information, Mr. Bresland stated that he believed two of the tanks had been used to store No. 2 fuel oil, two of the tanks had stored caustic solution and that the remaining tanks had been used to hold various materials associated with the process. He advised that he believes a contract had been let by Allied Chemical to Mobile Hydro Hydraulics of Devault, Pennsylvania in 1976 for removal of liquid, hydroblasting of the tanks and removal of the tank heels. The liquid was identified in a response to the EPA as having a pH of 11.5 and 13,000 ppm of phenolics. It was supposed that these phenolic waters had been left over when the process was discontinued and, therefore, had relatively little commercial value. It is believed that while the process was operating they would have been recycled back into the process. Mr. Bresland also indicated that apparently samples of the materials removed had been provided to Mobile Hydro Hydraulics as indicated by the contract.

I will appreciate your furnishing me with copies of the Summons and Complaint in the above-captioned action and any answer which has been filed. If you furnish us with copies of the documents referenced by Mr. Donovan in his June 26th letter we will try to interpret these for you.

As indicated to Mr. Donovan, Allied Chemical will undertake to re-review purchasing, accounts payable and other documents for the period 1973 to 1976 for any further indication of use of ABM by Allied Chemical at these locations, as Mr. Donovan requested. If indications of such are found we will communicate the information to you.

Very truly yours,


G. David Van Epps

cc: Messrs. Brueckner ✓
Shields
Bresland
Donovan

☐ INDUSTRIAL CHEMICALS DIVISION
☒ SPECIALTY CHEMICALS DIVISION

| | |
|---------------------------|-----------------------|
| M | ISSUED BY |
| 71. Gov. Privately Placed | CHECKED BY MK |
| to. Pas 19113 | SHIPPING OFFICE Em |
| | DISTRICT OFFICE |
| | PRODUCT MANAGER |
| | DIRECTOR OF SALES |

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| ROUTE & FOR | | DOCUMENT HASH |
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DISPOSAL SERVICE CO.

329 NORTH GOV. PRINTZ BOULEVARD

LESTER, PENNA. 19113

Phone 521-2500

Customer's
Order No.

Date

5-6-1974

Sold To

Allied Chem - (Bob Louie)

Address

City

Marcus Hook

QUAN.

DESCRIPTION

PRICE

AMOUNT

3 FLUORINE CYLINDERS
'N' Size

CODE-

89

SPECIALTY CHEMICALS DIV.

ALLIED CHEMICAL CORPORATION

BAKER & ADAMSON WORKS

Date Rec'd.

MAY 6 1974

SUBJECT TO

OUR CHECK AND COUNT

Rec'd. By

NAME IN FULL

TAX

THANK YOU Please keep this copy for reference.

TOTAL

No. 04293
UNARCO INCORPORATED

DRIVER

RECEIVED BY

From Ht Daily Record #39

Sat 12-11-71
Normal

Sun 12-12-71
Normal

- Mon 12-13-71
1 Hartford Ins. inspecting
#2 P.H. Boiler
2 Bricklayers working on
#2 PH Boiler
3 Bunch inspecting all pumps
4 Clamp repair (mt grain) SP
Receiver at Bauxite.
Tuesday 12-14-71
1 Boil wash finished in
#2 PH Boiler

Wednesday 12/15/71
1 Oil in sluiceway
Steam valve left open
on #5 burner on #7 Boiler
from about 5 P.M. till 8:10 A.M.
Oil in ~~sluiceway~~ ^{main} Sun Oil
in with pump rollers
absorbent (3 trucks) used
1 load straw, 2 crews
stayed all night (#301200) (255)

Thursday 12/16/71
1 Cheating cleaning blades
Roman on restaurant air
compressor
2 Caulked fire line joint
in Rock line nit Looking

Monday Dec 20, 1971
Working on #3 PH. Boiler
main steam valve, compressor

- 2 Replacing drain lines on
small trap by soft joint.
3 Painting water softener
4 Painted turbine H.P.B.F.P.
5 Waterway top of Bauxite
blowover. Laid in air line.

Tuesday Dec 21 1971
1 Worked over 2 unions
& connector on tubing to
meter (gas) no #6 B/99.
2 Replaced orifice valves
#6 & supplies to gas meter
in #6 B/99
3 Worked over 50 PSI water

Friday Dec. 17, 1971
1 Braising fire line in
Boil line PT

- 2 Changed drain line from
steam to burners on #1 Boiler
trap removed - Steam doesn't
exhaust piped to valve to
prevent oil spillage.
3 Small

Saturday Dec 18, 1971
Normal

Sunday Dec 19, 1971.
Normal